

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,
Plaintiff,

v.

HUMANISTIC PSYCHOLOGY
INSTITUTE, d/b/a SAYBROOK
INSTITUTE and MAUREEN O'HARA,
Individually,
Defendants.

STIPULATION BETWEEN THE PARTIES REGARDING DISCOVERY

The named parties to this action have attempted to work together to agree on outstanding discovery issues. As a result of their communications, the following stipulations have been made and agreed upon by the parties:

(1) Due to the amount of time defendants believe to be necessary to cover the allegations and documents in a deposition, the plaintiff has agreed to produce herself for up to two days for her deposition. The deposition of the plaintiff is scheduled to take place on January 26, 2006 and January 27, 2006.

(2) Due to the amount of time plaintiff believes to be necessary to cover the allegations and documents in a deposition, the defendants have agreed that it will produce defendant Maureen O'Hara for up to two days for a deposition. The deposition is scheduled to take place on March 13, 2006 and March 14, 2006.

(3) The defendants also agree on producing Alan Vaughan for his deposition in California.

(4) The defendants also agree on producing Dr. Arthur Bohart for his deposition in California, provided that he is medically able to participate during the week of March 13 to 17, 2006. If Dr. Bohart is not medically able to participate, the parties will cooperate to conduct his deposition by telephone or other remote electronic means, pursuant to F.R.C.P. 30(b)(7), or upon written questions, pursuant to F.R.C.P. 31. The parties agree that Dr. Bohart's deposition may occur after March 31, 2006.

Submitted by:

Plaintiff,
By its counsel,

/s/ Paul W. Morenberg

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Defendants,
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